

EXHIBIT 3

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By E-mail

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Re: *In re Application of Antonio del Valle Ruiz, et al.*,
No. 18 Misc. 85 (ER) (S.D.N.Y)

Dear Joe:

Respondents have indicated in their Memorandum in Opposition to Petitioners' 1782 Petition (at 21-23) that the information sought by Petitioners in their 1782 includes certain information that is subject to confidentiality restrictions. To address Respondents' confidentiality concerns, attached please find a draft Protective Order that we are prepared to propose to the Court for entry. The Protective Order is based on the Sedona Conference's *International Principles on Discovery, Disclosure & Data Protection in Civil Litigation* (Transnational Edition) (Jan. 2017), at Appendix C. Please let me know if Respondents will agree to the entry of the Order or if you have any comments regarding the content of the same.

In addition, at pages 23-25 of their Memorandum, Respondents express concern about the burden and intrusiveness of Petitioners' document requests. Petitioners are prepared to meet and confer to address any such specific objections that Respondents may have. Moreover, in order to facilitate the meet and confer process, Petitioners are proposing the attached draft ESI Order to streamline the discovery process as much as possible. The ESI Order also is based on Sedona Conference guidance and principles. Please let me know if Respondents will agree to the entry of the ESI Order or if you have any comments regarding its content.

Sincerely,


Javier H. Rubinstein, P.C.

cc: Counsel of Record

Enclosures